

Exhibit 1

Rule 8.G. Chart

RULE 8.G. FAILURE TO STATE A CLAIM CHART

“Classic” Alter Ego Liability Against TWS GZ (and/or TWS HK)	
Elements Not Plausibly Alleged:	
Complete domination of the subsidiary corporation(s)	
Complete domination was used to commit a fraud or wrong	
The fraudulent or wrongful use of the corporate form injured plaintiff	

“Reverse” Alter Ego Liability Against TWS USA (and/or TWS HK)	
Elements Not Plausibly Alleged:	
Complete domination of the subsidiary corporation(s)	
Complete domination was used to commit a fraud or wrong	
The fraudulent or wrongful use of the corporate form injured plaintiff	
Existence of exceptional circumstances and egregious facts	
Additional “reverse piercing” equitable factors	

All Breach of Contract Claims Against TWS USA and TWS GZ	
Elements Not Plausibly Alleged:	
Existence of a contract between the parties	

Breach of The Epidemic Failure Provision Against All Defendants	
Elements Not Plausibly Alleged:	
Breach of contract	

All Breach of Express and Implied Warranty Claims Against TWS USA and TWS GZ	
Elements Not Plausibly Alleged:	
Existence of contractual privity	

Negligent Misrepresentation Against All Defendants	
Elements Not Plausibly Alleged:	
Existence of a special relationship	
A false representation the defendant(s) should have known was incorrect	
The information supplied was known be defendant(s) to be desired by plaintiff for a serious purpose	
Plaintiff intended to rely and act upon the alleged representation	
Plaintiff reasonably relied on the alleged representation to its detriment	
Plaintiff endured damages from the alleged representation that are not recoverable in contract	